

Vinson&Elkins

Ari M. Berman
Tel 1.212.237.0228 Fax 1.917.849.5368

August 19, 2016

By ECF

The Honorable P. Kevin Castel
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: In re Vanguard Natural Resources Bondholder Litigation, Case No. 16-cv-1578 (PKC)

Dear Judge Castel:

We represent defendants Vanguard Natural Resources, LLC, VNR Finance Corp., Vanguard Natural Gas, LLC, VNR Holdings, LLC, Vanguard Permian, LLC, Encore Energy Partners Operating LLC, Encore Clear Fork Pipeline LLC, Vanguard Operating, LLC, Escambia Operating Co. LLC, Escambia Asset Co. LLC, Eagle Rock Upstream Development Company, Inc., Eagle Rock Upstream Development Company II, Inc., Eagle Rock Acquisition Partnership, L.P., Eagle Rock Acquisition Partnership II, L.P., Eagle Rock Energy Acquisition Co., Inc., and Eagle Rock Energy Acquisition Co., II, Inc. ("Defendants") in the above-referenced action. We write pursuant to Rule 4(E) of Your Honor's Individual Practices to respectfully request oral argument on Defendants' Motion to Dismiss the Consolidated Second Amended Class Action Complaint, which was filed today by ECF (Dkt. No. 40).

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Ari M. Berman

Ari M. Berman

cc: All counsel of record (by ECF)